REMARKS

Claims 15–20 and 24–29 are now pending in the application. Claim 29 has been amended. Applicants respectfully traverse and request reconsideration.

Claim Objections

Claim 20 is objected to because the Examiner has failed to find support for the last limitation. Specifically, the Examiner states that "claim 20 recites the phrase 'wirelessly sending *the* graphics drawing command' (italicized for emphasis), referring back to the graphics drawing commands used to produce the rendered graphics image data that has been sent to the wireless monitor." Applicants have amended claim 20 to recite "first graphics drawing commands," which are used to "produce the rendered graphics image data," and "second graphics drawing commands," which are wirelessly sent to a short range wireless receiver. Therefore, reconsideration and withdrawal of the objection to claim 20 is respectfully requested.

Rejection under 35 U.S.C. § 112

Claims 15–20 and 24–29 stand rejected to under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Applicants have amended the specification to include well known information regarding the term" drawing command" as was well known in the art when the present application was filed, although applicants are not obligated to provide notoriously well known information. More specifically, Applicants have amended the background of the specification using "drawing command" as supported for example by at least a background section of U.S. Pat. No. 6,564,304, col. 1, line 65 – col. 2, line 3; ; and FOLEY, James D., "Computer Graphics'. Principles and Practice. 2nd ed. in C," Addison-Wesley, Boston, 1996; pp. 19-20; §1.6.3, 3rd paragraph. Therefore, reconsideration and withdrawal of the rejection of claims 15–20 and 24–29 is respectfully requested.

Rejection under 35 U.S.C. § 102

Claims 15–20 and 24–29 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Hannah (U.S. Pat. No. 6,771,704).

With regard to claim 24, Hannah fails to show, teach, or suggest, inter alia, sending graphics drawing commands wirelessly to be processed remotely, wherein the graphics drawing commands include at least geometric primitive information.

As best understood by Applicants, Hannah discloses a video data stream that is re-encoded using motion vectors from a prior encoding operation. The video data may be enhanced by the system. Information about the enhancement, along with the decoded motion vectors, is sent to encoding circuitry. Information provided to the encoder is tailored to the type of video data received or to the type of enhancement performed, or based on other criteria. Using the previously derived motion vectors, the encoding circuitry performs fewer computations than when calculating motion vectors from scratch.

In the Office Action, the Examiner contends that motion vectors are analogous to graphics drawing commands. Applicants respectfully disagree that motion vectors are analogous to graphics drawing commands. However, in order to expedite prosecution, Applicants have amended claim 24 to include the limitation "wherein the graphics drawing commands include at least geometric primitive information," which was well known in the art when the application was filed. Applicants can find no mention of sending graphics drawing commands wirelessly to be processed remotely, wherein the graphics drawing commands include at least geometric primitive information in the cited portions of Hannah.

Moreover, Applicants' specification does not support the Examiner's interpretation of motion vectors being analogous to graphics drawing commands, nor does the Hannah reference. In fact, the cited portions of Hannah actually contradict the Examiner's interpretation.

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It is well known in the art that graphics drawing commands are used <u>to create</u> graphics objects by instructing graphics processing circuitry to draw a line, primitive, object or other graphic based on the drawing commands. Motion vectors in contrast are used on already created frames for the sole purpose of compressing already created frames. In other words, graphics drawing commands are used to <u>create</u> graphics – not to compress already existing frames.

Hannah also states the same. For example, in col. 7, line 41, Hannah states that "graphics elements are…created by…commands…." The motion vectors as described in Hannah and as well known in the art are completely different and instead are used to compress existing frames of information to code a moving picture. Successive pictures or frames are compared and the motion of an area from one picture to another is measured to produce motion vectors. A coder attempts to predict the object in its new position by shifting pixels from the previous picture using the motion vectors. Motion vectors are used with already generated images or frames.

In addition, in each instance described in Hannah, (see for example column 7) the motion vectors or motion hints are all used to compress already generated images or objects. They are never used to create graphic elements. As such, Applicants respectfully submit that the Examiner appears to have misapprehended the Hannah reference and known terms of art and as such, Hannah does not teach what is alleged and the claims are in condition for allowance. If the rejection is maintained, Applicants respectfully request factual support for the Examiner's interpretation since it is inconsistent with Applicants' Specification, the cited reference and with terms of art. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 24.

Claims 15 and 26–30 are allowable for at least similar reasons as claim 24. Therefore, reconsideration and withdrawal of the rejection of claims 15 and 26–30 is respectfully requested.

Claim 16–19 and 25 each ultimately depend on claims 15 and 24, respectively, and are allowable for at least similar reasons. Claim 16–19 and 25 are also believed to be allowable for having novel and nonobvious subject matter. Therefore, reconsideration and withdrawal of the rejection of claims 16–19 and 25 is respectfully requested.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (312) 609-7788.

Respectfully submitted,

Date: <u>February 25, 2010</u>

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